



REGULATORY GUIDE

NEBRASKA DEPARTMENT OF HEALTH AND HUMAN SERVICES REGULATION AND LICENSURE

REGULATORY GUIDE 3.5

GUIDE FOR THE PREPARATION OF LICENSE APPLICATIONS FOR THE USE OF RADIOACTIVE MATERIAL AT ACADEMIC INSTITUTIONS OF LIMITED SCOPE

1. INTRODUCTION

PURPOSE AND SCOPE

This guide describes the type of information that should be in applications for specific licenses of limited scope for the possession and use by academic institutions of radioactive material. It does not apply to applications for specific licenses of broad scope, licenses for source or special nuclear materials, or licenses for kilocurie irradiation sources. It includes the general principles that will be considered in evaluating an applicant's proposed radiation safety measures.

APPLICABLE REGULATIONS

The applicable chapters of Title 180, "Control of Radiation" to the Use of Radioactive Material at Academic Institutions of Limited Scope are 180 NAC 10, "Notices, Instructions and Reports to Workers; Inspections"; 180 NAC 4, "Standards for Protection Against Radiation" and 180 NAC 3-011, "General Requirements for the Issuance of Specific Licenses". Other pertinent regulations are 180 NAC 3-016 through 3-022, 3-025 through 3-028, 180 NAC 15, "Training and Experience Requirements for Use of Radiation Sources"; 180 NAC 17, "Enforcement of Radiation Control Act and Rights to Hearing Procedures for Licensees and Registrants; Penalties" and 180 NAC 18, "Fees for Certificates of Registration, Radioactive Material(s) Licenses, Environmental Surveillance and Implementation, Emergency Planning, Emergency Response and Implementation and other Regulatory Services." The applicant should carefully study the regulations and this guide and submit all information requested.

TYPES OF LICENSES

It is generally desirable, and preferable to the Agency, that a single license be issued to an institution to cover the institution's entire radioisotope program. However, if the institution's usage of radioactive material is

NEBRASKA DEPARTMENT OF HEALTH & HUMAN SERVICES REGULATION AND LICENSURE, REGULATORY GUIDES

Regulatory Guides are issued to describe and make available to the public acceptable methods of implementing specific parts of Title 180 Nebraska regulations, "Control of Radiation", to delineate techniques used by the staff in evaluating specific problems or postulated accidents, or to provide guidance to applicants, licensees, or registrants. Regulatory Guides are not substitutes for regulations, and compliance with them is not required. Methods and solutions different from those set out in the guides will be acceptable if they provide a basis for the Nebraska Department of Health and Human Services Regulation and Licensure Department, Public Health Assurance Division, Radioactive Materials Program, to make necessary determination to issue or continue a license or certificate of registration.

Comments and suggestions for improvements in these Regulatory Guides are encouraged at all times and they will be revised, as appropriate, to accommodate comments and to reflect new information or experience. Comments should be sent to the Nebraska Department of Health and Human Services, Regulation and Licensure, Public Health Assurance Division, Radioactive Materials Program, 301 Centennial Mall South, P.O. Box 95007, Lincoln, NE 68509.

Requests for single copies of issued guides (which may be reproduced) should be made in writing to the Nebraska Department of Health and Human Services, Regulation and Licensure Department, Public Health Assurance Division, Radioactive Materials Program, 301 Centennial Mall South, P.O. Box 95007, Lincoln, NE 68509.

(Rev 4) 5-2003

rather limited and not easily amenable to central control, separate licenses may be issued to the institution to cover individual departments. In either case, the institution is the licensee.

2. LICENSE FEES

An application fee is required for all specific licenses and must be submitted with any NEW application. The applicant should refer to 180 NAC 18 to determine the amount that should accompany the application. Review of the application will not begin until the proper fee is received by the Agency. The check or money order should be made payable to the Nebraska Department of Health and Human Services Regulation and Licensure.

In the case of an application for renewal or amendment, a fee should NOT be submitted with the application. All current licensees will be billed annually according to the expiration month of their current license.

3. FILING AN APPLICATION

An application for radioactive material license should be completed on Form NRH-5 provided by the Agency. Complete Items 1 through 5, and 15 on the form. For Items 6 through 14, submit additional information on supplementary pages if needed. Each separate sheet or document submitted with the application should be identified and keyed to the item number on the application to which it refers. You should complete all items in the application in sufficient detail for the PUBLIC HEALTH ASSURANCE DIVISION Staff to determine that your equipment, facilities, training and experience, and radiation safety program are adequate to protect health and to minimize danger to life and property.

The forms should be completed in duplicate. Retain one copy for yourself, because the license will require that you possess and use radioactive material in accordance with the statements and representations in your application and in any supplements to it.

Mail original application to the Department of Health and Human Services Regulation and Licensure, Public Health Assurance Division, 301 Centennial Mall South, P.O. Box 95007, Lincoln, Nebraska 68509.

4. CONTENTS OF AN APPLICATION

The following comments apply to the indicated items of form NRH-5.

Item 1(a). Applicant's Name and Mailing Address

Enter the name and corporate address of the academic institution.

Item 1(b). Locations of Use

List all addresses and locations where radioactive material will be used or stored if other than that in Item 1(a), e.g., university-owned farm, second campus, research station. A Post Office Box number should not be stated as the address for a place of use. The addresses and locations will become part of the license conditions, if the license application is approved, and the addresses or locations at which radioactive materials or radioactive wastes are located or stored may not be changed without obtaining a license amendment.

Item 2. Person to be Contacted About Application

List all departments or similar subdivisions of the institution where radioactive material will be used, e.g., biology, physics, chemistry, department of research.

Name the individual who knows your program and can answer questions about the application. Also, please note the telephone number at which the individual may be contacted. If the contact changes, notify the Agency. Notification of a contact change is for information only and would not be considered an application for a license amendment.

Item 3. Self-explanatory

Item 4. Individual User(s)

Specify the names of the persons who will directly supervise the use of radioactive material or who will use radioactive material without supervision.

Item 5. Individuals Responsible for Radiation Safety Program

All licensees must have a Radiation Safety Officer (RSO) or Radiation Protection Officer (RPO) designated by and responsible to the corporation's management for the coordination of the radiation protection program. A statement should be included with the application outlining the named individual's duties and responsibilities. The radiation safety officer is expected to coordinate the safe use of radioactive materials and to ensure compliance with Title 180 and Conditions of the license. Typical duties of the radiation protection officer would be:

Ensure that licensed material possessed by the licensee is limited to the type and quantities of byproduct material listed on the license.

Maintain documentation that demonstrates that the dose to individual member of the public does not exceed the limit of 180 NAC 10-013.

Ensure security of radioactive material.

Posting of documents as required by 180 NAC 10-003.

Ensure that licensed material is transported in accordance with applicable Agency and U.S. Department of Transportation (DOT) requirements.

Ensure that radiation exposures are "ALARA."

Oversee all activities involving radioactive material, including monitoring and surveys of all areas in which radioactive material is used.

Act as a liaison with the Agency and other regulatory authorities.

Provide necessary information on all aspects of radiation protection to personnel at all levels of responsibility, pursuant to 180 NAC 4 and 180 NAC 10, and any other applicable regulations.

Oversee proper delivery, receipt, and conduct of radiation survey for all shipments of radioactive material arriving at or leaving from the institution, as well as packaging and labeling of all radioactive material leaving the institution.

Determine the need for personnel monitoring, distribute and collect personnel radiation monitoring devices, evaluate bioassays, monitor personnel radiation exposure and bioassay records for trends and high exposures, notify individuals and their supervisors of radiation exposures approaching the limits, and recommend appropriate remedial action.

Conduct training programs and otherwise instruct personnel in the proper procedures for handling radioactive material prior to use, at periodic intervals (refresher training), and as required by changes in procedures, equipment, regulations, etc.

Supervise and coordinate the radioactive waste disposal program, including effluent monitoring and recordkeeping on waste storage and disposal records.

Oversee the storage of radioactive material not in current use, including waste.

Perform or arrange for leak test on all sealed sources and calibration of radiation survey instruments.

Maintain an inventory of all radioisotopes possessed under the license and limit the quantity to amounts authorized by the license.

Immediately terminate any unsafe condition or activity that is found to be a threat to public health and safety or property.

Supervise decontamination and recovery operations.

Maintain other records not specifically designated above, for example, records of receipts, transfers, and surveys as required by 180 NAC 3-030 and 4-046 through 4-056.

Hold periodic meetings with, and provide reports to, licensee management.

Ensure that all users are properly trained.

Perform periodic audits of the radiation safety program to ensure that the licensee is complying with all applicable Agency regulations and terms and conditions of the license (e.g., leak tests, inventories, use limited to trained, approved users, etc.), the content and implementation of the radiation safety program to achieve occupational doses and doses to members of the public that are ALARA in accordance with 180 NAC 4-004 and required records are maintained.

Ensure that the results of audits, identification of deficiencies, and recommendations for change are documented (and maintained for at least 3 years) and provided to management for review; ensure that prompt action is taken to correct deficiencies.

Ensure that the audit results and corrective actions are communicated to all personnel who use licensed material.

Ensure that all incidents, accidents, and personnel exposure to radiation in excess of ALARA or 180 NAC 4 limits are investigated and report to the Agency or appropriate authorities, if required, within the required time limits.

Maintain understanding of and up-to date copies of Title 180, the license, revised licensee procedures, and ensure that the license is amended whenever there are changes in licensed activities, responsible individuals, or information or commitments proved to the Agency during the licensing process.

Item 6. Radioactive Material Data

- A. List each radionuclide to be used and specify the particular nuclides, such as "carbon-14," "cobalt-60," etc.
- B. If radioactive material is contained in a sealed source, give manufacturer's name and model number of source. If material is not sealed, give chemical form (such as "sodium iodide") or physical form (such as "gas," "metal," "accelerator targets," "plated foils," etc.).
- C. Show total maximum activity (Curies, Millicuries or Microcuries) to be possessed at any one time for each form listed. Possession limits requested should cover the total anticipated inventory, including material in storage, in use, or as waste, and should be commensurate with the applicant's needs and facilities for safe handling.
- D. Describe the use of the particular form. If used in a device, give the make and model number of device. If used in animals, field applications, classroom experiments, or demonstrations, please specify.

Items 7 and 8. Training and Experience

These items must be completed for each individual(s) name in Item 4 and 5, use supplemental sheets if necessary. Submit a resume of the training and experience of each person who will directly supervise the use of material, who will use material without supervision, or who will have responsibilities for radiological safety.

Training should cover (a) principles and practices of radiation protection, (b) radioactive measurements, standardization, and monitoring techniques and instruments, (c) mathematics and calculations basic to the use and measurement of radioactivity, and (d) biological effects of radiation.

The description of the use of radioactive materials should include the specific isotopes handled, the maximum quantities of materials handled, where the experience was gained and the type of use. The qualifications, training, and experience of each person should be commensurate with the material and its use as proposed in the application.

Training and Experience Requirements for Laboratory Use of Small Quantities of Radioactive Material Personnel are as Follows:

For Millicurie Quantities

Radiation Safety Officer and/or Authorized User:

A college degree at the bachelor level, or equivalent training and experience in the physical or biological sciences or in engineering, and

Forty (40) hours of formal instruction in:

Radiation physics and instrumentation;

Radiation protection;

Mathematics pertaining to the use and measurement of radioactivity; and

Biological effects of radiation; and

Demonstrate an understanding of operating and emergency procedures and Title 180 or their equivalent.

For Microcurie Quantities

Radiation Safety Officer and/or Authorized User:

Forty (40) hours of formal instruction in:

Radiation physics and instrumentation;

Radiation protection;

Mathematics pertaining to the use and measurement of radioactivity; and

Biological effects of radiation; and

Demonstrate an understanding of operating and emergency procedures and Title 180 or their equivalent.

Items 9 and 10. Radiation Detection Instruments and Calibration of Instruments

Specify for each radiation detection instrument the manufacturer's name and model number, the number of each type of instrument available, the type of radiation detection (alpha, beta, gamma, or neutron), the sensitivity range (milliroentgens per hour or counts per minute), the window thickness in mg/cm² and the type of use. The type of use would normally be monitoring, surveying, assaying, or measuring.

Describe the instrument calibration procedures. State the frequency, and describe the methods and procedures for the calibration of survey and monitoring instruments, as well as any other instruments and systems used in the radiation protection program, such as measuring instruments used to assay sealed-source leak-test samples (see Item 13), contamination samples (e.g., air samples, surface "wipe" samples), and bioassay samples (see Item 13).

An adequate calibration of survey instruments usually cannot be performed with built-in check sources. Electronic calibrations that do not involve a source of radiation are also not adequate (except for instruments only intended for qualitative (yes/no) surveys for contamination detection) to determine the proper functioning and response of all components of an instrument.

Daily operation checks of survey instruments must be supplemented every twelve (12) months with a two point (1/3 and 2/3 of the full scale reading) calibration on each scale of each instrument. Survey instruments should also be calibrated following repair. A survey instrument may be considered properly calibrated when the instrument readings are within ± 10 percent of the calculated or known values for each point checked. Readings within ± 20 percent are considered acceptable if a calibration chart or graph is prepared and attached to the instrument.

If the applicant proposes to calibrate his instruments, a detailed description of planned calibration procedures should be submitted. The description of calibration procedures should include, as a minimum:

- A. The manufacturer and model number of the source(s) to be used.
- B. The nuclide and quantity of radioactive material contained in the source.
- C. The accuracy of the source(s) and the traceability of the source to a primary standard.
- D. The step-by-step procedures including associated radiation safety procedures, and
- E. The name(s) and pertinent experience of person(s) who will perform the calibrations.

If the applicant intends to contract out the calibration of instruments, the name, address, and license number of the firm should be specified together with the frequency of calibration. The applicant should contact the firm that will perform the calibrations to determine if information concerning calibration procedures has been filed with the Agency. If this information concerning calibration procedures has not been filed, it should be obtained and submitted.

Instruments that will be used for quantitative measurements to determine compliance with Agency regulations (e.g., leak test measurements, effluent monitoring) must be calibrated at twelve (12) month intervals. A description of the procedure for calibration of such instruments should be submitted and should include:

- A. The manufacturer and model number of the source(s),
- B. The nuclide and quantity of radioactive material in the sources(s),
- C. The accuracy of the sources(s) and the traceability of the source to a primary standard,
- D. The step-by-step procedures for calibration, including associated radiation procedures, and
- E. The name(s) and pertinent experience of person(s) who will perform the calibrations.

Item 11. Personnel Monitoring Devices

180 NAC 4-022 states the conditions requiring individual monitoring of external and internal occupational dose.

Personnel dosimeters that require processing to determine the radiation dose to a worker to compare to the 180 NAC 4-005, 4-011 and 4-012 dose limits must be processed and evaluated at a dosimetry processor per 180 NAC 4-021.03, that is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP).

Item 12. Facilities and Equipment

Describe the facilities and equipment (e.g., remote handling equipment, storage containers, shielding, fume hoods) to be made available at each location where radioactive material will be used. Include a description of the area(s) assigned for the receipt, storage, preparation, and measurement of radioactive materials. A diagram should be submitted showing the locations of shielding, the proximity of radiation sources to unrestricted areas, and other items related to radiation safety. When applicable to facilities where radioactive materials may become airborne, the diagrams should also include schematic descriptions of the ventilation system, with pertinent airflow rates, pressures, filtration equipment, and monitoring instruments. Diagrams should be drawn to a specified scale, or dimensions should be indicated. The locations of the facilities and equipment should be specified with respect to the addresses and locations given in Item 1(b).

Item 13. Radiation Protection Program

Written radiation safety procedures to be followed by users should be provided as part of the application and should include the following items:

- A. Procedures for performing the required annual radiation protection program audit. These procedures should specify who will perform the audit and where the records are kept.
- B. Procedures for ordering radioactive materials, for receipt of materials during off-duty hours, and for notification of responsible persons upon receipt of radioactive materials. These procedures should be adequate to ensure that possession limits are not exceeded, that radioactive materials are secured against unauthorized removal at all times, and that radiation levels in unrestricted areas do not exceed the limits specified in 180 NAC 4-014. It is preferable that all radioactive materials be received in one location so that they may be reliably accounted for and surveyed expeditiously.
- C. Procedures for examining incoming packages for leakage, contamination, or damage and for safely opening packages in accordance with 180 NAC 4-038. The monitoring should be performed as soon as practicable after receipt of the package of radioactive material. The procedures may vary depending upon the quantity of radioactive material received, but should, at a minimum, include instructions for surveying packages, wearing gloves while opening packages, and checking packing material for contamination. Even though 180 NAC 4-038 exempts certain packages from immediate monitoring, all packages should be monitored before they are opened.
- D. A description of training required for laboratory personnel or students who are involved in or associated with the use of radioactive materials. The description should include the form of training (e.g., formal course work, lectures), the duration of training, the subject matter included, and the means of determining the proficiency of each person handling radioactive materials. The training program should be of sufficient scope to ensure that all personnel using radioactive materials receive proper instruction in accordance with 180 NAC 10-003 and are knowledgeable in radiation safety procedures and techniques pertinent to their respective duties.
- E. A description of how the determination was made that dosimetry was not needed or else a description of how and who among the workers will be monitored. An evaluation of dose that the public could realistically receive should also be performed.

F. Bioassay Procedures

The applicant should show that the need for bioassays has been thoroughly considered and should establish the adequacy of the proposed bioassay program in relation to the proposed program of use of radioactive material. Bioassays are normally required when individuals work with millicurie quantities of hydrogen-3, iodine-125 or iodine-131 depending on the type of work, equipment, and procedures followed. Other materials may also be used in physical or chemical forms and under conditions that present an opportunity for uptake by the body through ingestion, inhalation, or absorption. A bioassay program to determine and control the uptake of radioactive material should be considered and discussed in relation to each such material, procedures, etc.

Bioassays may not be substituted for other elements of a safety program such as air monitoring and dispersion control (hoods, glove boxes, etc.) and for well-thought-out and well-executed handling procedures.

G. A copy of general instructions to be followed by laboratory personnel or students while working with radioactive materials. These instructions should:

- (1) Outline control procedures for obtaining permission to use radioactive materials at the institution; give limitations on quantity to be handled per student or allowed per experiment.
- (2) Explain what laboratory apparel to wear and what safety equipment to use (e.g., use of laboratory coats, gloves, and remote pipetting devices).
- (3) Prescribe limitations and conditions on handling liquid or loose (unencapsulated or dispersible) radioactive materials and what laboratory equipment to use in working with them. For example, explain when materials and operations should be confined to radiochemical fume hoods or glove boxes and explain what shielding or remote handling equipment is to be used when hard beta-or gamma emitting materials are handled.
- (4) Instruct the user about routine survey and monitoring procedures for each contamination control zone.
- (5) Instruct the user about movement of materials between rooms, halls, or in corridors, if applicable.
- (6) Explain requirements for storage of materials and labeling of containers and how areas will be identified where radioactive materials are used. Explain where and how contaminated articles and glassware are to be handled and stored.
- (7) Specify personnel monitoring devices to be used, where to obtain them, and instructions given on recording exposure results or properly turning in personnel monitoring devices for processing at appropriate intervals.
- (8) Instruct the user in waste disposal procedures to follow in the laboratory, including limitations for disposal of liquid or solid wastes by the user and procedures to use for waste storage within each laboratory.
- (9) Explain what records are to be kept for the use and disposal of material.
- (10) Describe sealed-source leak-test procedures.
- (11) Describe contamination control procedures, including restrictions against smoking and consumption of food and beverages.

- H. A copy of emergency instructions to be posted in all laboratory areas where radioactive materials are used. These instructions should (1) describe immediate action to be taken in order to prevent contamination of personnel and work areas, e.g., turning off the ventilation, evacuation of the areas, containment of the spill, (2) state the telephone numbers of the responsible persons to be notified in case of an emergency, and (3) instruct personnel on appropriate methods for reentering, decontaminating, and recovering facilities that may have been accidentally contaminated.
- I. Procedures to be followed if radioisotopes will be used in animals, including (1) a description of the animal housing facilities, (2) a copy of instructions provided to animal caretakers for handling animals, animal wastes, and carcasses, (3) instructions for cleaning and decontaminating animal cages, and (4) procedures for ensuring that animal rooms will be locked or otherwise secured unless attended by authorized users of radioactive material.
- J. A description of the routine survey program, including the areas to be surveyed, the types and levels of radiation and contamination considered to be acceptable, and provisions for maintaining records of surveys. The individual user should supplement the surveys performed by the radiation safety staff. Regularly used laboratories should be surveyed for contamination at the end of each workday (except when quantities less than those in Appendix 2 of 180 NAC 4 are handled by an employee at any one time), and the user should maintain records of such surveys in units required by 180 NAC 4, even if only a single measurement is necessary.
- K. Sealed Source Leak-Test Procedures

Sealed sources containing more than 100 microcuries of a beta or gamma emitter or more than 10 microcuries of an alpha emitter must be leak tested at 6-month intervals. Leak testing of alpha-particle-emitting sources containing more than 10 microcuries of an alpha emitter is required at 3-month intervals. If a commercial firm is to perform the leak tests, the name, address, and license number of the firm should be submitted. If the tests are to be performed using a commercial "kit," the name of the kit manufacturer or distributor and the kit model designation should be given. If the applicant intends to perform his own leak tests without the use of a commercial kit, the following information should be submitted.

 - (1) Qualifications of personnel who will perform the leak test,
 - (2) Procedures and materials to be used in taking test samples,
 - (3) The type, manufacturer's name, model number, and radiation detection and measurement characteristics of the instrument to be used for assay of test samples.
 - (4) Instrument calibration procedures, including calibration source characteristics, make and model number, and
 - (5) The method, including a sample calibration, to be used to convert instrument reading to units of activity, e.g., microcuries.
- L. Decontamination and decommissioning records must be kept. These are comprised of:
 - (1) floor plans of area originally licensed for radioactive materials and any changes there to;
 - (2) areas of spills that still test positive for existing radioactive contamination; and
 - (3) other records mentioned in 180 3-018.07, items 3 and 4.

Item 14. Waste Disposal

The procedures for disposing of radioactive material waste should be described. Under Title 180 NAC 4 a licensee may dispose of waste in the following ways:

- A. Transfer to a person properly licensed to receive such waste in conformance with 180 NAC 4-039.01, item 1. The name of the firm (which should be contacted in advance to determine any limitations that the firm may have on acceptance of waste) should be given.
- B. Release into a sanitary sewer in conformance with 180 NAC 4-041. Depending on water usage, releases of up to 1 curie per year are permitted.
- C. Release into air or water in concentrations in conformance with 180 NAC 4-014. Possible exposure to persons off-site limits the amount that may be released.
- D. Treatment or disposal by incineration in conformance with 180 NAC 4-042. This must be specifically approved by the Agency.
- E. Other methods specifically approved by the Agency pursuant to 180 NAC 4-040.

Item 15. Certification

The application must be signed by a person authorized to sign on behalf of the academic institution. This will usually be an executive officer of the institution, the dean of the particular school, the business manager, or some other designated official.

5. AMENDMENTS TO A LICENSE

After you are issued a license, you must conduct your program in accordance with (1) the statements, representations, and procedures contained in your application, (2) the terms and conditions of the license, and (3) Title 180.

It is your obligation to keep your license current. You should anticipate the need for a license amendment insofar as possible. If any of the information provided in your application is to be modified or changed, submit an application for a license amendment. In the meantime, you must comply with the terms and conditions of your license until it is actually amended; Title 180 does not allow you to implement changes on the basis of a submission requesting an amendment to your license.

An application for a license amendment may be prepared either on the application Form NRH-5 or in letter form and should be submitted to the address specified in Section 3 of this guide. Your application should identify your license by number and should clearly describe the exact nature of the changes, additions, or deletions. References to previously submitted information and documents should be clear and specific and should identify the pertinent information by date, page, and paragraph. For example, if you wish to change the "responsible individual," specified in Item 5, your application for a license amendment should specify the new responsible individual's name, training, and experience. The qualifications of the new responsible individual should be equivalent to those specified in Item 7 of this guide.

6. RENEWAL OF A LICENSE

Licenses are issued for a period of up to 5 years. You must send an application for renewal to the address specified in Section 3 of this guide. When submitting your renewal application you should submit all your latest relevant procedures rather than referring to your previously submitted materials.

You should:

- A. Review your current license to determine whether the information concerning the sealed sources and unsealed sources accurately represents your current and anticipated program. Identify any additions, deletions, or other changes and then prepare information appropriate for the required additions or changes.
- B. Review the documents you have submitted in the past to determine whether the information in them is up to date and accurately represents your facilities, equipment, personnel, radiation

safety procedures, locations of use, and so on. Changes should be made in the documents as necessary to reflect your current program.

- C. Review Title 180 to ensure that any changes in the regulations are appropriately covered in your program description.
- D. After you have completed your review, submit a letter to the Agency requesting renewal of your license and providing the information as delineated earlier in this document.
- E. Include the name and telephone number of the person to be contacted about your renewal application and include your current mailing address if it is not indicated correctly on your license.

If you file your application for license renewal at least 30 days before the expiration date of the license, your present license will automatically remain in effect until the Agency takes final action on your renewal application. However, if you file an application less than 30 days before the expiration date and the Agency cannot process it before that date, you would be without a valid license when your license expires.

If you do not wish to renew your license, you must dispose of all licensed radioactive material you possess in a manner authorized by 180 NAC 4 and send a notification of disposition of the materials to the Agency before the expiration date of your license with a request that your license be terminated.

If you cannot dispose of all the licensed radioactive material in your possession before the expiration date, you must request a license renewal for storage only of the radioactive material. The renewal is necessary to avoid violating Agency regulations that do not allow you to possess licensable material without a valid license.